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Attorneys for Defendant NAVIENT SOLUTIONS, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

DAVID WOODRING,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC., EQUIFAX INFORMATION SERVICES,
LLC, NAVIENT, and NEW YORK STATE
BOARD OF HIGHER EDUCATION,

Defendants.

Case No. 2:19-cv-00030-JAD-VCF

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR NAVIENT
TO FILE AN ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT**

(SECOND REQUEST)

Plaintiff DAVID WOODRING ("Plaintiff") and Defendant NAVIENT SOLUTIONS, LLC, incorrectly named NAVIENT in the Complaint, by and through their respective counsel, stipulate and agree to extend the deadline from the current deadline of February 22, 2019 (ECF No. 13) to March 9, 2019, for Defendant NAVIENT SOLUTIONS, LLC ("NSL"), to File an Answer or Otherwise Respond to Plaintiff's Complaint (ECF No. 1).

On January 4, 2019, Plaintiff filed his Complaint. The claims at issue necessitate additional time for fact-finding, and the parties have been discussing the documents necessary to determine their respective claims and defenses in order to try and resolve this case. Further, NSL is in the process of acquiring additional documents, based on conversations with Plaintiff, so that it can meaningfully respond to the specific allegations contained in Plaintiff's Complaint. Plaintiff has no opposition to NSL's request for an extension until March 9, 2019 to file an answer or otherwise respond to Plaintiff's Complaint. Moreover, NSL participated in the 26(f) conference with

Plaintiff, and the extension should not impact any of the deadlines in the Stipulated Discovery Plan and Scheduling Order that will soon be filed by the parties.

This is the second stipulation for extension of time for NSL to respond to Plaintiff's Complaint and is being made in good faith and not for purposes of undue delay. No additional requests for extensions are contemplated.

IT IS SO STIPULATED.

Dated this 21st day of February, 2019.

**HOLLEY, DRIGGS, WALCH, FINE,
WRAY, PUZEY & THOMPSON**

/s/ Michael R. Ayers
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Attorneys for Defendant NAVIENT SOLUTIONS, LLC

Dated this 21st day of February, 2019.

KNEPPER & CLARK LLC

/s/ Miles Clark
MILES CLARK, ESQ.
10040 W. Cheyenne Avenue
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Las Vegas, Nevada 89129
Attorneys for Plaintiff

ORDER

The Stipulation for Extending Deadline for NSL to file an answer or otherwise respond up to and including March 9, 2019 is so ORDERED AND ADJUDGED.

Dated this 21st day of February, 2019.


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of January, 2019, I served a copy of the foregoing
**STIPULATION AND ORDER EXTENDING DEADLINE FOR NAVIENT TO FILE AN
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT** upon the party
below via electronic service through the United States District Court for the District of Nevada’s
ECF system:

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